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Johnathon Mapuatuli, In Pro Se  
Federal Register Number: 75490-112  
Federal Prison Camp  
3705 W. Farn Rd.  
Lompoc, CA 93436

United States District Court  
For The Eastern District of Michigan  
Southern Division

United States of  
America, Plaintiff

VS

Johnathon Mapuatuli  
Defendant

Case Number: 18-CR-20161

Request for Appointment of  
Counsel for Indigent  
Defendant

Honorable Matthew F.  
Leitman, Chambers 125

Comes now Johnathon Mapuatuli, Defendant,  
In Pro Se and requests the court to appoint  
counsel for Defendant to file a motion for  
Compassionate Release under the Cares Act.

This request is based on the following facts:

1. I made a request, through my wife Rubi Mapuatuli to the Federal Public Defenders Office to represent me in the filing of a motion for Compassionate Release under the Cares Act and the various directives to the Bureau of

Prisons (BOP) promulgated by Attorney General William Barr.

2. The Federal Public Defenders Office indicated that I would need to get the court to appoint them to represent me in my motion for Compassionate Release due to the COVID-19 Pandemic.
3. Based upon that directive I wrote a letter to this court on May 11, 2020 requesting Appointment of Counsel.
4. On June 3, 2020 the court, in answer to my letter, ordered me to identify to the court what type of motion I wished Appointed Counsel to file on my behalf.
5. As stated herein I want Appointed Counsel to file a motion for Compassionate Immediate Release under the provisions of the Cares Act basing said motion on the following facts.

A) As you may be aware Lompoc Federal Correctional Complex (FCC) currently has the most positive testing inmates in the federal prison system. That is only considering that the Lompoc Federal Correctional Institution (FCI) is the ONLY building that tested, if not all majority of it's inmates along with inmates that fall out or showing symptoms. Lompoc FCC currently has a total of four

COVID-19 related deaths to date June 4, 2020.

B) My most current medical conditions diagnosed by Loma Linda Medical Group prior to my self surrender April 4, 2019 puts me at greater risks of contracting COVID-19. These medical conditions allow me to be more susceptible to COVID-19 are: a body mass index greater than 40, Chronic Bronchitis, Obstructive Sleep Apnea, Diabetes and Severe Hypertension. Due to my multiple respiratory health conditions and low immune system I am fearful of my life with more inmates showing symptoms and cases occurring daily here at the camp.

C) I have already submitted a formal cop out to my Warden on April 5, 2020 and have not received a response and it has been 60 days of this writing June 4, 2020. Accordingly due to the BOP's failure to respond within 30 days I may appeal directly to the District Court.


D) I am currently serving a 23 month sentence at Lompoc Federal Prison Camp. As of this writing, I have served 14 months out of my 23 month sentence. As you may be aware, we are

currently under "lockdown" conditions at this time. My only consistent means of communication is by United States Postal Services. I have very limited access to our Law library or typewriters. Only 15 minutes per day 5 days a week.

6. Wherefore, Defendant respectfully requests that counsel be appointed to file a motion for Compassionate Release on his behalf.

I declare under penalty of perjury that the foregoing is true and correct as to the best of my ability.

Respectfully Submitted  
This 6<sup>th</sup> day of June 2020  
At Lompoc, CA.

  
Johnathon Mokuatuli

Schmather Napuatahi 75490-112  
Federal Prison Camp  
3705 W. Fawn Rd.  
Lompoc, CA 93436

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75490-112

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Flint, MI 48502  
United States

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